

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**Ashley Adams., et al**  
*Plaintiffs,*

v.

**Brad Livingston, et al**  
*Defendants.*

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Civil Action No. 6:13-cv-712

Jury Demanded

**DEFENDANTS' NOTICE OF INITIAL DISCLOSURE**

Defendants, Texas Department of Criminal Justice, Robert Eason, Dennis Miller, Reginald Goings, Debra Gilmore, Reyvoda Dodd, Doris Edwards, Brandon Matthews, Sarah Raines, and Tully Flowers, through counsel, submit that they have complied with federal and local rules pertaining to the duty to disclose relevant documents and information to all concerned parties.

Respectfully submitted,

**GREG ABBOTT**

Attorney General of Texas

**DANIEL T. HODGE**

First Assistant Attorney General

**DAVID C. MATTAX**

Deputy Attorney General for  
Defense Litigation

**KAREN D. MATLOCK**

Assistant Attorney General  
Chief, Law Enforcement Defense Division

/s/ Bruce R. Garcia

**BRUCE R. GARCIA**

Assistant Attorney General  
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**ATTORNEYS FOR DEFENDANTS**  
Texas Department of Criminal Justice,  
Robert Eason, Dennis Miller, Reginald  
Goings, Debra Gilmore, Reyvoda Dodd,  
Doris Edwards, Brandon Matthews, Sarah  
Raines, and Tully Flowers

**NOTICE OF ELECTRONIC FILING**

I, **BRUCE R. GARCIA**, Assistant General of Texas, do hereby certify that I have electronically submitted for filing, a true and correct copy of the above an foregoing in accordance with the Electronic Case Files System of the Eastern District of Texas, on the 30<sup>th</sup> day of October, 2013.

/s/ Bruce R. Garcia  
**BRUCE R. GARCIA**  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I, **BRUCE R. GARCIA**, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing **Defendants' Notice of Initial Disclosure** has been served by placing same in the United States Mail, postage prepaid, on this the 30<sup>th</sup> day of October, 2013, addressed to:

Jeff Edwards  
Scott Medlock  
The Edwards Law Firm  
The Bremond Houston House  
706 Guadalupe  
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***Via CM# 7008 0500 0001 5048 6194***

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*Via hand delivery*

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/s/ Bruce R. Garcia  
**BRUCE R. GARCIA**  
Assistant Attorney General